

Schnader
ATTORNEYS AT LAW

140 BROADWAY SUITE 3100
NEW YORK, NY 10005-1101
212.973.8000 FAX 212.972.8798 schnader.com

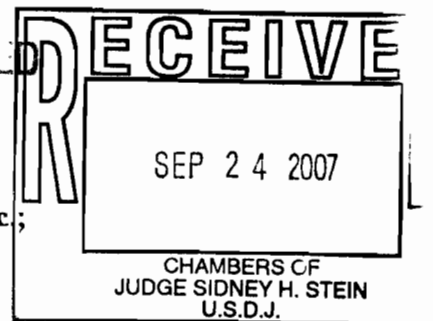
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September 24, 2007

VIA FAX

Hon. Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**RE: Truong v. Charles Schwab & Co., Inc.;
No. 07 Civ. 8085 (SHS)**



Dear Judge Stein:

We represent the defendant in the above-captioned case, which was removed from state court on September 14, 2007, and which, we learned today, was assigned to Your Honor. As the Court is aware, we have moved, by order to show cause in six related actions (*Vishipco Line v. Charles Schwab & Co.*, Nos. 02 Civ. 7823, et al. (SHS)), for an order holding plaintiff in this case in contempt of court for violating this Court's filing injunction in *Vishipco* by filing the instant case in state court without leave of court. Plaintiff moved for summary judgment in state court on September 10, 2007 (returnable today) and has sought leave to move to have this case remanded to state court.

We are writing this letter in order to request that the Court stay our time to answer or move with respect to this complaint (as well as our time to respond to plaintiff's motions for summary judgment and to remand) until after the Court has heard our motion for contempt, which is returnable on October 26, 2007. Our client received the summons and complaint by mail on September 10, 2007. Therefore, pursuant to Rule 81(c), Fed. R. Civ. P., our answer is due 20 days after receipt (by service or otherwise), or five days after removal, whichever is longer. Accordingly, defendant's answer or motion would be due October 1, 2007 (the first business day after the expiration of the 20-day period).

Because that date is quickly approaching, we are requesting this stay at this time.

Defendant's attorney shall send a copy of this letter to plaintiff

Respectfully,

Daniel J. Brooks

Daniel J. Brooks

For SCHNADER HARRISON SEGAL & LEWIS LLP

cc: Mac Truong (by hand)

SO ORDERED 9/27/07

Schnader Harrison Segal & Lewis LLP

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